

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 85-93

WASTE DISCHARGE REQUIREMENTS FOR:

MONSANTO POLYMER PRODUCTS COMPANY  
AND KIMBALL SMALL PROPERTIES,  
SANTA CLARA

1. Monsanto Polymer Products Company ("Monsanto") and Kimball Small Properties, hereinafter collectively called the dischargers, are responsible for pollution at portions of a 25 acre site located at the intersection of Lafayette Street and Walsh Avenue in Santa Clara. Kimball Small Properties is the present property owner. These sites are a 2-acre "filter backwash" and "seven buried trenches" (see Site Attachment A).
2. During the mid-1960's through 1975, Monsanto, the former property owner, discharged filter backwash water onto a centralized two acre "filter backwash" area. The backwash material was mostly water with some salts mixed with amino and phenolic resins. The area was covered with two feet of soil in 1975 and today exists as an open field. Upon discovering that the backwash water may have caused a pink color to the shallow groundwater in the immediate vicinity of the area, Monsanto elected to take remedial action to reduce the color. In 1982, a groundwater extraction trench spanning the area was constructed and the extracted groundwater has been discharged to the City of Santa Clara sewer system up to the present time.
3. During the 1950's and 1960's Monsanto buried waste materials in trenches on-site. Buried materials include rejected resin and laboratory samples, construction debris and domestic refuse. A total of 1,500 cubic yards of soil were excavated and removed to an approved disposal site in 1983.
4. Monsanto has submitted a remedial action report dated February 1985. The recommendation of the report is to stop the existing ground water monitoring and cleanup program. The report further indicates that the pollution plume in the groundwater has been adequately defined.

5. The remedial action report shows concentrations of the pollutant 2-hydroxy-5-methyl-1, 3-benzene dicarboxylic acid (HMBA) at up to 152 parts per million (ppm) in the ground water. Other pollutants discovered include the following:
  - a. SOIL

Toluene; Ethyl Benzene; Xylene; Chlorobenzotriazole; Bis-2-Ethylxylphthalate; Dimethylphthalate; Dichlorocyclohexane; Trimethylcyclopentane; Methylbenzenesulfonamid; Chlorocyclohexanol; 1,1,-oxybisbutane; Dibutoxymethanol; 4-Hydroxybenzene Acetic Acid Ethylester.
  - b. GROUNDWATER

Toluene; Ethyl Benzene; Xylene; Benzene; Freon 113; Cresol; Dibutoxymethanol; Dimethyl Cyclohexadienedione; C<sub>8</sub>Ether; 1,1,1-Trichloroethane (TCA); Trichloroethylene (TCE); Dimethylphenol (Not 2,4 Isomer); Methylbenzoic Acid; Hydroxymethylbenzoic Acid; Dibutylether.
6. The remedial action report discussed in Finding 4 was transmitted by Board staff for review by concerned agencies. The County of Santa Clara Environmental Health, Hazardous Materials Program, The California Departments of Health Services, Sanitary Engineering Branch and Toxicological Studies Section and the Santa Clara Valley Water District have separately indicated that they do not agree with the report's recommendation to terminate groundwater cleanup, especially given the pollutant levels of HMBA stated in Finding 5.
7. The Board finds the proposed remedial action report unacceptable and further finds that the existing ground water monitoring and cleanup programs should be continued.
8. The Board adopted a revised Water Quality Control Plan (Basin Plan) for the San Francisco Bay Region on July 21, 1982. The Basin Plan contains water quality objectives for San Francisco Bay. The Basin Plan also contains water quality objectives for groundwater.
9. The beneficial uses of San Francisco Bay include:
  - a. Recreation
  - b. Fish migration and habitat

- c. Habitat and resting for waterfowl and migratory birds
  - d. Industrial water supply
  - e. Esthetic enjoyment
10. The groundwater underlying the facility is used for industrial water supply. The nearest drinking water well is approximately one mile away. The existing and potential beneficial uses of the groundwater underlying the facility include:
- a. Industrial process water supply
  - b. Industrial service supply
  - c. Domestic supply
  - d. Agricultural supply
11. The Board has notified the discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for the discharge and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
12. This project constitutes a minor modification to land and such activity is thereby exempt from the provisions of the California Environmental Quality Act (CEQA) in accordance with Section 15304, of the Resources Agency Guidelines.
13. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, that Monsanto Polymer Products Company and Kimball Small Properties in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, shall comply with the following:

A. PROHIBITIONS

- 1. The discharge of wastes or hazardous materials in a manner which will degrade water quality or adversely affect beneficial uses of the groundwaters of the State is prohibited.
- 2. The discharge of wastes or hazardous materials through subsurface transport to surface waters in quantities or concentrations which will degrade the beneficial uses is prohibited.

3. Containment and/or cleanup of polluted groundwater shall not cause the spread of pollution in an adverse manner at an adjoining or otherwise affected site.
4. Activities associated with the subsurface investigation and cleanup which will cause further migration of the pollution is prohibited.
5. Bypassing of wastewater from the wastewater treatment system to waters of the State is prohibited. If bypassing should occur, the discharger shall notify this Board's Executive Officer as soon as possible.

B. SPECIFICATIONS

1. The treatment or disposal of waste shall not create a nuisance as defined in Section 13050(m) of the California Water Code.
2. The vertical and lateral extent of pollution shall be defined. Should monitoring results show evidence of plume migration, additional plume characterization shall be required.
3. Additional migration of groundwater pollutants from the plant site and related off-site areas of the plume shall be prevented.


C. Provisions

1. In order to comply with Specifications B.2, the dischargers shall submit a technical report, by August 15, 1985. This report shall provide for additional groundwater monitoring to completely define the extent of groundwater pollution or provide a rationale acceptable to the Board's Executive Officer for not conducting further plume definition studies per Section 13267(b) of the California Water Code.
2. In order to comply with Specification B.3, the dischargers shall submit a technical report, by August 15, 1985. This report shall discuss the status of groundwater plume containment, and include a program and time schedule acceptable to the Board's Executive Officer to provide for such data as necessary to document plume containment.

3. The discharger shall report to the Board annually, with the first report due July 17, 1986, on effectiveness of the groundwater containment cleanup program. The report shall discuss the treatment and disposal of the extracted groundwater, the status of the underground pollution plume, and the expected results of future extractions.
4. All samples shall be analyzed by laboratories using methods approved by the Board's Executive Officer for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board staff review.
5. The dischargers shall permit the Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code:
  - a. Entry upon premises in which any pollution sources exist, or may potentially exist, or in which any required records are kept.
  - b. Access to copy any records required to be kept under terms and conditions of this Order.
  - c. Inspection of any monitoring equipment or methods required by this Order.
  - d. Sampling of any groundwater or soil which is accessible, or may become accessible as part of any investigation or remedial action program, to the dischargers.
6. The dischargers shall file a report on any material changes in the nature, quantity, or transport of polluted groundwater associated with the pollution described in this Order.
7. The dischargers shall maintain in good working order and operate, as efficiently as possible, any facility or control system installed to achieve compliance with the requirements of this Order.
8. The Board will review this Order periodically and may revise the requirements when necessary. The dischargers may request a review of these requirements by the Board at any time.

9. In the event of any change in control or ownership of land or waste discharge facilities presently owned or controlled by the dischargers, the dischargers shall notify the succeeding owner or operator of the existence of this Order by a letter, a copy of which shall be forwarded to this Board.
10. The dischargers shall submit quarterly piezometric surface maps of the ground water as part of studies to verify the groundwater plume containment.
11. The dischargers shall submit to the Board technical reports on self-monitoring work performed according to a program approved by the Board's Executive Officer.
12. The dischargers shall comply with all sections of this Order immediately upon adoption.

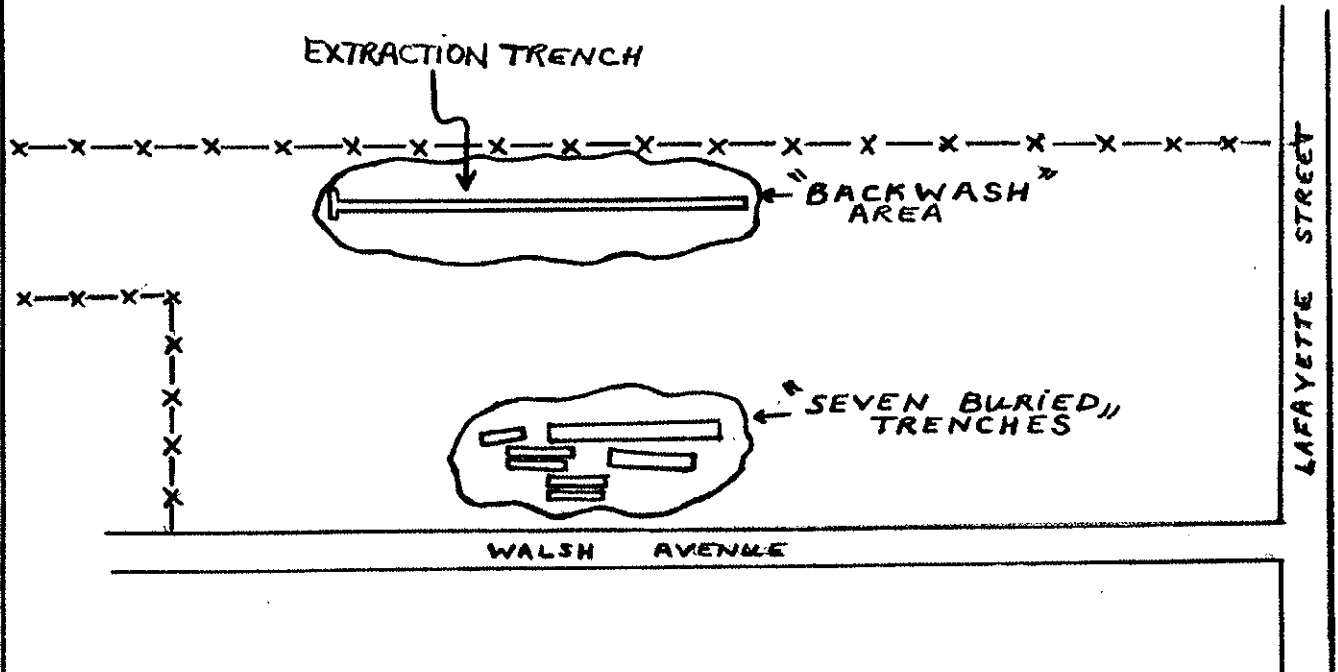
I, Roger B. James, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on July 17, 1985.

  
ROGER B. JAMES  
Executive Officer

Attachment:

- A. Site Map

OWENS CORNING



TECHNICAL  
COATINGS  
COMPANY



NOT TO SCALE

STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

SITE LOCATION MAP

MONSANTO POLYMER  
PRODUCTS COMPANY  
SANTA CLARA

ATTACHMENT A

DRAWN BY: RMB DATE: 6-24-85 DRWG. NO.